Remarks

This Application has been carefully reviewed in light of the Office Action mailed November 4, 2004. Applicants appreciate the Examiner's consideration of the Application and respectfully request favorable action in this case.

Claim Rejections — 35 U.S.C. § 112

The Examiner rejected Claims 11, 12, 14-18, 20, 21, 24, 26, 37, 38, 40-44, 53, 54, 56-60, 62-65, and 67-71 under 35 U.S.C. § 112, first paragraph, as failing to comply with the written description requirement. In particular, the Examiner asserts that the original disclosure fails to teach each position corresponding to a particular receiver "independent of the value for that position" as recited in Claims 11, 26, 37, and 67-71. Contrary to the Examiner's assertion, the original specification includes a description that reasonably conveys to one skilled in the relevant art that the inventor(s) had possession of the claimed invention at the time the application was filed. In particular, Applicants direct the Examiner to Page 17, lines 4-24.

Rejections — 35 U.S.C. § 102

The Examiner rejected Claims 16, 17, 42, 43, 58, 59, 64, 65, 67, 68, 70 and 71 under 35 U.S.C. § 102(b) as anticipated by U.S. Patent No. 5,351,294 (*Matsumoto*).

Independent Claim 67 and Dependent Claims 16, 17

Independent Claim 67 recites:

> A telecommunications device, comprising:
>> a local area network;
>> a plurality of receivers coupled to the network; and
> a sender coupled to the network and operable to generate a message packet comprising a destination code and a data packet, the destination code having values for a plurality of positions, each position corresponding to a particular receiver, the sender operable to identify one or more receivers for the data packet according to the values of the positions corresponding to the receivers, the sender operable to communicate the data packet to the identified receivers.

Matsumoto does not disclose, teach, or suggest the telecommunications device of Claim 67. *Matsumoto* describes a method for broadcasting information between separate

devices—in particular, from information service unit 104 to user terminals 107, 110, 116, 120, and 124. (Col. 5, l. 45 - col. 6, l. 14). Thus, the format of data transmission described with reference to Figure 6 of *Matsumoto* does not relate to communication between a sender and receivers all within a telecommunications device as recited in Claim 67. For at least this reason, *Matsumoto* does not disclose, teach, or suggest the telecommunications device of Claim 67. Accordingly, Applicants respectfully request reconsideration and allowance of independent Claims 67, as well as all claims that depend from Claim 67.

Dependent Claim 17 recites:

> The device of Claim 67, wherein the sender is operable to communicate the destination code to each receiver, each receiver having an associated receive code comprising values for a plurality of positions, each position corresponding to a particular receiver, each receiver operable to receive the destination code and to compare the value for at least one position of the destination code with the value for at least one position of the receive code, each receiver operable to determine whether to receive the data packet according to the comparison.

Matsumoto does not disclose, teach, or suggest "each receiver having an associated receive code comprising values for a plurality of positions, each position corresponding to a particular receiver, each receiver operable to receive the destination code and to compare the value for at least one position of the destination code with the value for at least one position of the receive code, each receiver operable to determine whether to receive the data packet according to the comparison," as recited in Claim 17. In particular, the Examiner does not cite any portion of *Matsumoto* which discloses the recited receive code. As expressly recited in Claim 17, the receive code is different from the destination code. The Examiner improperly attempts to rely of the destination information 604 of *Matsumoto* to show both the destination code and receive code in the recited limitation. *Matsumoto* does not disclose comparing the values of two different codes—the receive code (including values for a plurality of positions) and the destination code—to determine whether to receive a data packet. For this additional reason, Claim 17 is allowable over *Matsumoto*. Accordingly, Applicants respectfully request reconsideration and allowance of dependent Claim 17.

Independent Claim 68 and Dependent Claims 42, 43

Independent Claim 68 recites:

> A method of communicating a data packet using a local area network within a telecommunications device, comprising:
>
> generating a message packet comprising a destination code and the data packet, the destination code having values for a plurality of positions, each of the positions corresponding to a particular receiver;
>
> identifying one or more receivers for the data packet according to the values of the positions corresponding to the receivers; and
>
> communicating the data packet to the identified receivers using the network.

Matsumoto does not disclose, teach, or suggest a "method of communicating a data packet using a local area network within a telecommunications device," as recited in Claim 68. As described above with reference to Claim 67, *Matsumoto* describes a method for broadcasting information between separate devices—in particular, from information service unit 104 to user terminals 107, 110, 116, 120, and 124. (Col. 5, l. 45 - col. 6, l. 14). Thus, the format of data transmission described with reference to Figure 6 of *Matsumoto* does not relate to communication within a telecommunications device, as recited in Claim 68. For at least this reason, *Matsumoto* does not disclose, teach, or suggest the method of Claim 68. Accordingly, Applicants respectfully request reconsideration and allowance of independent Claims 68, as well as all claims that depend from Claim 68.

Dependent Claim 43 recites:

> The method of Claim 68, further comprising:
>
> receiving the destination code;
>
> comparing the value for at least one position of the destination code with the value for at least one position of a receive code, the receive code associated with a receiver and comprising values for a plurality of positions, each position corresponding to a particular receiver; and
>
> determining whether to receive the data packet according to the comparison.

Matsumoto does not disclose, teach, or suggest "comparing the value for at least one position of the destination code with the value for at least one position of a receive code, the receive code associated with a receiver and comprising values for a plurality of positions, each position corresponding to a particular receiver," as recited in Claim 43. In particular, the Examiner does not cite any portion of *Matsumoto* which discloses the recited receive code.

As expressly recited in Claim 43, the receive code is different from the destination code. The Examiner improperly attempts to rely of the destination information 604 of *Matsumoto* to show both the destination code and receive code in the recited limitation. *Matsumoto* does not disclose comparing the values of two different codes—the receive code (including values for a plurality of positions) and the destination code—to determine whether to receive a data packet. For this additional reason, dependent Claim 43 is allowable over *Matsumoto*. Accordingly, Applicants respectfully request reconsideration and allowance of dependent Claim 43.

Independent Claim 70 and Dependent Claims 58, 59

Independent Claim 70 recites:

Logic for communicating a data packet using a local area network within a telecommunications device, the logic encoded in media and operable to:

generate a message packet comprising a destination code and the data packet, the destination code having values for a plurality of positions, each of the positions corresponding to a particular receiver;

identify one or more receivers for the data packet according to the values of the positions corresponding to the receivers; and

communicate the data packet to the identified receivers using the network.

Matsumoto does not disclose, teach, or suggest logic "for communicating a data packet using a local area network within a telecommunications device," as recited in Claim 70. As described above with reference to Claim 67, *Matsumoto* describes a method for broadcasting information between separate devices—in particular, from information service unit 104 to user terminals 107, 110, 116, 120, and 124. (Col. 5, l. 45 - col. 6, l. 14). Thus, the format of data transmission described with reference to Figure 6 of *Matsumoto* does not relate to communication within a telecommunications device, as recited in Claim 70. For at least this reason, *Matsumoto* does not disclose, teach, or suggest the logic of Claim 70. Accordingly, Applicants respectfully request reconsideration and allowance of independent Claims 70, as well as all claims that depend from Claim 70.

Dependent Claim 59 recites:

> The logic of Claim 70, further operable to:
> receive the destination code;
> compare the value for at least one position of the destination code with the value for at least one position of a receive code, the receive code associated with a receiver and comprising values for a plurality of positions, each position corresponding to a particular receiver; and
> determine whether to receive the data packet according to the comparison.

Matsumoto does not disclose, teach, or suggest logic operable to "compare the value for at least one position of the destination code with the value for at least one position of a receive code, the receive code associated with a receiver and comprising values for a plurality of positions, each position corresponding to a particular receiver " as recited in Claim 59. In particular, the Examiner does not cite any portion of *Matsumoto* which discloses the recited receive code. As expressly recited in Claim 59, the receive code is different from the destination code. The Examiner improperly attempts to rely of the destination information 604 of *Matsumoto* to show both the destination code and receive code in the recited limitation. *Matsumoto* does not disclose comparing the values of two different codes—the receive code (including values for a plurality of positions) and the destination code—to determine whether to receive a data packet. For this additional reason, dependent Claim 59 is allowable over *Matsumoto*. Accordingly, Applicants respectfully request reconsideration and allowance of dependent Claim 59.

Independent Claim 71 and Dependent Claims 64, 65

Independent Claim 71 recites:

> A message packet for communication using a local area network within a telecommunications device, comprising:
> a data packet; and
> a destination code, the destination code having values for a plurality of positions, each position corresponding to a particular receiver, the values of the positions corresponding to the receivers operable to identify one or more receivers for the data packet, the data packet operable to be communicated to the identified receivers.

Matsumoto does not disclose, teach, or suggest a "message packet for communication using a local area network within a telecommunications device," as recited in Claim 71. As described above with reference to Claim 67, *Matsumoto* describes a method for broadcasting information between separate devices—in particular, from information service unit 104 to user terminals 107, 110, 116, 120, and 124. (Col. 5, l. 45 - col. 6, l. 14). Thus, the format of data transmission described with reference to Figure 6 of *Matsumoto* does not relate to communication within a telecommunications device, as recited in Claim 71. For at least this reason, *Matsumoto* does not disclose, teach, or suggest the message packet of Claim 71. Accordingly, Applicants respectfully request reconsideration and allowance of independent Claims 71, as well as all claims that depend from Claim 71.

Dependent Claim 65 recites:

> The message packet of Claim 71, wherein the destination code operable to be communicated to each receiver, each receiver having an associated receive code comprising values for a plurality of positions, each position corresponding to a particular receiver, the destination code operable to be received by each receiver and the value for at least one position of the destination code compared with the value for at least one position of the receive code by the receiver to determine whether to receive the data packet.

Matsumoto does not disclose, teach, or suggest "each receiver having an associated receive code comprising values for a plurality of positions, each position corresponding to a particular receiver, the destination code operable to be received by each receiver and the value for at least one position of the destination code compared with the value for at least one position of the receive code by the receiver to determine whether to receive the data packet," as recited in Claim 65. In particular, the Examiner does not cite any portion of *Matsumoto* which discloses the recited receive code. As expressly recited in Claim 65, the receive code is different from the destination code. The Examiner improperly attempts to rely of the destination information 604 of *Matsumoto* to show both the destination code and receive code in the recited limitation. *Matsumoto* does not disclose comparing the values of two different codes—the receive code (including values for a plurality of positions) and the destination code—to determine whether to receive a data packet. For this additional reason, dependent Claim 65 is allowable over *Matsumoto*. Accordingly, Applicants respectfully request reconsideration and allowance of dependent Claim 65.

Claim Rejections — 35 U.S.C. § 103

The Examiner rejected Claims 11, 24, 26, 37, 53, and 69 under 35 U.S.C. § 103 as being unpatentable over U.S. Patent No. 4, 593,282 (*Acampora*) in view of *Matsumoto*.

Independent Claim 11

Independent Claim 11 recites:

A telecommunications device, comprising:
a local area network;
a sender coupled to the network and operable to generate a message packet comprising an arbitration code and a data packet, the sender operable to communicate a first value of the arbitration code using the network and to determine a network value, the sender operable to compare the first value with the network value to determine whether the sender may communicate the data packet using the network; and
a plurality of receivers also coupled to the network, the message packet further comprising a destination code having values for a plurality of positions, each position corresponding to a particular receiver, the sender identifying one or more receivers for the message packet according to the values of the positions corresponding to the receivers,
wherein each receiver has an associated receive code comprising values for a plurality of positions, each position corresponding to a particular receiver, each receiver operable to receive the destination code and to compare the value for at least one position of the destination code with the value for at least one position of the receive code, each receiver operable to determine whether to receive the data packet according to the comparison.

Matsumoto does not disclose, teach, or suggest a telecommunication device as recited in Claim 11. As described above with reference to Claim 67, *Matsumoto* describes a method for broadcasting information between separate devices—in particular, from information service unit 104 to user terminals 107, 110, 116, 120, and 124. (Col. 5, l. 45 - col. 6, l. 14). Thus, the format of data transmission described with reference to Figure 6 of *Matsumoto* does not relate to communication within a telecommunications device, as recited in Claim 11.

Furthermore, *Matsumoto* does not disclose, teach, or suggest "each receiver has an associated receive code comprising values for a plurality of positions, each position corresponding to a particular receiver, each receiver operable to receive the destination code and to compare the value for at least one position of the destination code with the value for at

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least one position of the receive code, each receiver operable to determine whether to receive the data packet according to the comparison," as recited in Claim 11. In particular, the Examiner does not cite any portion of *Matsumoto* which discloses the recited receive code. As expressly recited in Claim 11, the receive code is different from the destination code. The Examiner improperly attempts to rely of the destination information 604 of *Matsumoto* to show both the destination code and receive code in the recited limitation. *Matsumoto* does not disclose comparing the values of two different codes—the receive code (including values for a plurality of positions) and the destination code—to determine whether to receive a data packet.

Moreover, the Examiner does not provide any motivation to combine the cited references.

For at least these reasons, the Examiner's cited combination does not disclose, teach, or suggest the telecommunications device of Claim 11. Accordingly, Applicants respectfully request reconsideration and allowance of independent Claims 11, as well as all claims that depend from Claim 11

Independent Claim 26 and Dependent Claims 24

Independent Claim 26 recites:

> A message packet for communication using a local area network within a telecommunications device, comprising:
> a data packet;
> an arbitration code comprising a message priority code and a sender address, a first value of the arbitration code operable to be communicated using the network and to be compared with a network value to determine whether the sender may communicate the data packet to the receiver using the network; and
> a destination code having values for a plurality of positions, each position corresponding to a particular receiver, the values of the positions identifying one or more receivers for the data packet, the value for at least one position of the destination code operable to be compared with a value for at least one position of a receive code associated with a receiver to determine whether the receiver will receive the data packet.

Matsumoto does not disclose, teach, or suggest a "message packet for communication using a local area network within a telecommunications device," as recited in Claim 26. As described above with reference to Claim 67, *Matsumoto* describes a method for broadcasting

information between separate devices—in particular, from information service unit 104 to user terminals 107, 110, 116, 120, and 124. (Col. 5, l. 45 - col. 6, l. 14). Thus, the format of data transmission described with reference to Figure 6 of *Matsumoto* does not relate to communication within a telecommunications device, as recited in Claim 11.

Furthermore, *Matsumoto* does not disclose, teach, or suggest "a destination code having values for a plurality of positions, each position corresponding to a particular receiver, the values of the positions identifying one or more receivers for the data packet, the value for at least one position of the destination code operable to be compared with a value for at least one position of a receive code associated with a receiver to determine whether the receiver will receive the data packet," as recited in Claim 26. In particular, the Examiner does not cite any portion of *Matsumoto* which discloses the recited receive code. As expressly recited in Claim 26, the receive code is different from the destination code. The Examiner improperly attempts to rely of the destination information 604 of *Matsumoto* to show both the destination code and receive code in the recited limitation. *Matsumoto* does not disclose comparing the values of two different codes—the receive code (including values for a plurality of positions) and the destination code—to determine whether to receive a data packet.

Moreover, the Examiner does not provide any motivation to combine the cited references.

For at least these reasons, the Examiner's cited combination does not disclose, teach, or suggest the message packet of Claim 26. Accordingly, Applicants respectfully request reconsideration and allowance of independent Claims 26, as well as all claims that depend from Claim 26.

Independent Claim 37

Independent Claim 37 recites:

> A method of communicating a data packet using a local area network within a telecommunications device, comprising:
> generating a message packet comprising an arbitration code, the data packet, and a destination code having values for a plurality of positions, each position corresponding to a particular receiver;
> identifying one or more receivers for the message packet according to the values of the positions corresponding to the receivers;
> communicating a first value of the arbitration code using the network;

determining a network value;
comparing the first value with the network value;
determining whether to communicate the data packet using the network;
receiving the destination code;
comparing the value for at least one position of the destination code with the value for at least one position of a receive code, the receive code associated with a receiver and comprising values for a plurality of positions, each position corresponding to a particular receiver; and
determining whether to receive the data packet according to the comparison.

Matsumoto does not disclose, teach, or suggest a "method of communicating a data packet using a local area network within a telecommunications device," as recited in Claim 37. As described above with reference to Claim 67, *Matsumoto* describes a method for broadcasting information between separate devices—in particular, from information service unit 104 to user terminals 107, 110, 116, 120, and 124. (Col. 5, l. 45 - col. 6, l. 14). Thus, the format of data transmission described with reference to Figure 6 of *Matsumoto* does not relate to communication within a telecommunications device, as recited in Claim 37.

Furthermore, *Matsumoto* does not disclose, teach, or suggest "comparing the value for at least one position of the destination code with the value for at least one position of a receive code, the receive code associated with a receiver and comprising values for a plurality of positions, each position corresponding to a particular receiver" and "determining whether to receive the data packet according to the comparison," as recited in Claim 37. In particular, the Examiner does not cite any portion of *Matsumoto* which discloses the recited receive code. As expressly recited in Claim 37, the receive code is different from the destination code. The Examiner improperly attempts to rely of the destination information 604 of *Matsumoto* to show both the destination code and receive code in the recited limitation. *Matsumoto* does not disclose comparing the values of two different codes—the receive code (including values for a plurality of positions) and the destination code—to determine whether to receive a data packet.

Moreover, the Examiner does not provide any motivation to combine the cited references.

For at least these reasons, the Examiner's cited combination does not disclose, teach, or suggest the method of Claim 37. Accordingly, Applicants respectfully request

reconsideration and allowance of independent Claims 37, as well as all claims that depend from Claim 37.

Independent Claim 69 and Dependent Claim 53

Independent Claim 69 recites:

> Logic for communicating a data packet using a local area network within a telecommunications device, the logic encoded in media and operable to:
> generate a message packet comprising an arbitration code, the data packet, and a destination code having values for a plurality of positions, each position corresponding to a particular receiver;
> identify one or more receivers for the message packet according to the values of the positions corresponding to the receivers;
> communicate a first value of the arbitration code using the network;
> determine a network value;
> compare the first value with the network value; and
> determine whether to communicate the data packet using the network.

Matsumoto does not disclose, teach, or suggest "[l]ogic for communicating a data packet using a local area network within a telecommunications device," as recited in Claim 69. As described above with reference to Claim 67, *Matsumoto* describes a method for broadcasting information between separate devices—in particular, from information service unit 104 to user terminals 107, 110, 116, 120, and 124. (Col. 5, 1. 45 - col. 6, 1. 14). Thus, the format of data transmission described with reference to Figure 6 of *Matsumoto* does not relate to communication within a telecommunications device, as recited in Claim 71. Moreover, the Examiner does not provide any motivation to combine the cited references. For at least these reasons, the Examiner's cited combination does not disclose, teach, or suggest the logic of Claim 69. Accordingly, Applicants respectfully request reconsideration and allowance of independent Claims 69, as well as all claims that depend from Claim 69.

Dependent Claim 53 recites:

> The logic of Claim 69, further operable to:
> receive the destination code;
> compare the value for at least one position of the destination code with the value for at least one position of a receive code, the receive code associated with a receiver and

comprising values for a plurality of positions, each position corresponding to a particular receiver; and
    determine whether to receive the data packet according to the comparison.

Matsumoto does not disclose, teach, or suggest logic operable to "compare the value for at least one position of the destination code with the value for at least one position of a receive code, the receive code associated with a receiver and comprising values for a plurality of positions, each position corresponding to a particular receiver" and "determine whether to receive the data packet according to the comparison," as recited in Claim 53. In particular, the Examiner does not cite any portion of *Matsumoto* which discloses the recited receive code. As expressly recited in Claim 53, the receive code is different from the destination code. The Examiner improperly attempts to rely of the destination information 604 of *Matsumoto* to show both the destination code and receive code in the recited limitation. *Matsumoto* does not disclose comparing the values of two different codes—the receive code (including values for a plurality of positions) and the destination code—to determine whether to receive a data packet. For this additional reason, dependent Claim 53 is allowable over the Examiner's cited combination. Accordingly, Applicants respectfully request reconsideration and allowance of dependent Claim 53.

Dependent Claims 12, 18, 38, 44, 54, 60

The Examiner rejected dependent Claims 12, 18, 38, 44, 54, and 60 under 35 U.S.C. § 103 as being unpatentable over *Acampora* and *Matsumoto* in view of U.S. Patent No. 6,553,000 (*Ganesh*).

The cited combination does not disclose, teach, or suggest "at least one of the receivers is operable to perform network snooping according to its associated receive code," as recited in Claims 12 and 18, or "snoop[ing] on the network according to the receive code," as recited in Claims 38, 44, 54, and 60. As described above, none of the references disclose the recited receive codes recited. Furthermore, the cited references, including *Ganesh* do not disclose snooping according to any receive code. Moreover, the Examiner does not provide any motivation to combine the cited references.

For these additional reasons, dependent Claims 12, 18, 38, 44, 54, and 60 are allowable over the Examiner's cited combination. Accordingly, Applicants respectfully request reconsideration and allowance of dependent Claims 12, 18, 38, 44, 54, and 60.

Dependent Claims 14, 20, 40, 56, 62

The Examiner rejected dependent Claims 14, 20, 40, 56, and 62 under 35 U.S.C. § 103 as being unpatentable over *Acampora* and *Matsumoto* in view of *Ganesh*.

The cited combination does not disclose, teach, or suggest "the device is a switching unit further comprising a backplane and the network comprises a control bus," as recited in Claims 14, 20, 40, 56, and 62. As described above, *Matsumoto* does not disclose a method of communicating a data packet "within a telecommunication device." These dependent claims further specify "the device is a switching unit further comprising a backplane and the network comprises a control bus." The Examiner does not provide any motivation to apply the method for broadcasting information between separate devices (as described in *Matsumoto*) to a switching unit as recited in these dependent claims. For this additional reason, dependent Claims 14, 20, 40, 56, and 62 are allowable over the Examiner's cited combination. Accordingly, Applicants respectfully request reconsideration and allowance of dependent Claims 14, 20, 40, 56, and 62.

Dependent Claim 15, 21, 41, 57, 63

Dependent Claim 15, 21, 41, 57 and 63 depend from independent Claims 67, 26, 68, 70, and 71, respectively, and they are allowable because, at a minimum, they include the limitations of their respective base claims.

Conclusion

Applicants have made an earnest attempt to place this Application in condition for allowance. For at least the foregoing reasons, and for other reasons clearly apparent, Applicants respectfully request reconsideration and full allowance of all pending claims.

If the Examiner feels that a telephone conference would advance prosecution of this Application in any manner, the Examiner is invited to contact Jeffery D. Baxter, Attorney for Applicants, at the Examiner's convenience at (214) 953–6791.

Although Applicants believe no fees are due, the Commissioner is hereby authorized to charge any fee or credit any overpayment to Deposit Account No. 02–0384 of Baker Botts L.L.P.

Respectfully submitted,
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Attorneys for Applicants

Jeffery D. Baxter
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Date: _February 2, 2005_

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